JASON M. FRIERSON 1 United States Attorney 2 District of Nevada Nevada Bar Number 7709 3 SKYLER H. PEARSON Assistant United States Attorney 501 Las Vegas Blvd. So., Suite 1100 5 Las Vegas, Nevada 89101 (702) 388-6336 skyler.pearson@usdoj.gov 6 Attorneys for Marykay Loss Carlson, in her official capacity, and the United 8 States Department of State 9 UNITED STATES DISTRICT COURT **DISTRICT OF NEVADA** 10 11 Case No. 2:23-cv-00166-APG-VCF Francisca Nazareno Yson; Allan Nazareno Yson, Elmer Nazareno Yson, 12 Joint Stipulation to Extend Federal Gregorio Nazareno Cenon, Defendants' Deadline to Answer or 13 Plaintiffs, Otherwise Respond to Plaintiff's 14 Complaint [ECF No. 1] (Second ٧. Request) 15 Marykay Loss Carlson, in her official capacity as Ambassador Extraordinary and 16 Plenipotentiary of the Republic of the Philippines; United States Department of 17 State, 18 Defendants. 19 Plaintiffs, Francisca Nazareno Yson, Allan Nazareno Yson, Elmer Nazareno Yson, 20 and Gregorio Nazareno Cenon, and the United States of America, on behalf of Federal 21 Defendants Marykay Loss Carlson, in her official capacity, and the United States 22 Department of State, through counsel, hereby stipulate and agree to extend the United 23 States' Deadline to answer or otherwise respond to Plaintiffs' Complaint for Injunctive and 24 Mandamus Relief (ECF No. 1). The reason for the stipulation is as follows: 25 Plaintiffs filed their Complaint for Injunctive and Mandamus Relief on 1. 26 January 31, 2023. 27

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1	2. Plaintiffs served the Unite	ed States with a copy of the Summons and	
2	Complaint on February 1, 2023.		
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4		April 3, 2023, as April 2, 2023, fell on a Sunday. See Fed. R. Civ. P. 6(a)(1)(C).	
5		The parties stipulated and agreed to provide the Federal Defendants an	
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6	dditional 30 days to file an answer to the complaint or other responsive pleading (ECF		
7	No. 6). The Court granted the parties' stipulation and provided Federal Defendants until		
8	May 3, 2023, to answer or otherwise respond to Plaintiffs' complaint (ECF No. 7).		
9	5. Since the filing of the prev	vious stipulation, counsel for Federal Defendants'	
10	wife gave birth to a baby girl. Federal Defendants seek this 14-day extension to allow him		
11	time to take care of his wife and new baby. Accordingly, the parties believe good cause		
12	exists for the extension.		
13	Therefore, the parties request that the Court extend the deadline for the United State		
14	to answer or otherwise respond to May 17, 2023.		
15	Respectfully submitted this 2nd day of May 2023.		
16		JASON M. FRIERSON	
17		United States Attorney	
18	ALEXANDER R. VAIL Nevada Bar No. 14291 Law Office of Alexander R. Vail L. I. C. Attorneys for Federal Defendants	/s/ Skyler H. Pearson	
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21	Las Vegas, Nevada 89102 <u>alexander@vailimmigrationservices.com</u> Attorney for Plaintiff		
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23			
24		IT IS SO ORDERED:	
25		UNITED STATES MAGISTRATE JUDGE	
26			
27	DATED:		
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